

Jason M. Tangeman, WSB No. 6-3082  
 NICHOLAS & TANGEMAN, LLC  
 P.O. Box 928; 170 N. 5<sup>th</sup> St.  
 Laramie, WY 82073  
 (307) 742-7140  
 Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING

RIA R SQUARED, INC.,	)	Case No. 21-CV-125-S
a Delaware corporation	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	
PAUL D. MCCOWN, and	)	
MCCOWN ENTERPRISES, LLC,	)	
	)	
<i>Defendants.</i>	)	

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**STIPULATED MOTION TO EXTEND DEADLINES**

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**COMES NOW** Defendants, Paul D. McCown and McCown Enterprises, LLC, by and through counsel, Jason M. Tangeman, of Nicholas and Tangeman, LLC, and Plaintiff Ria R. Squared, Inc., by and through counsel Stuart R. Day, Williams Porter Day Neville, P.C., and respectfully moves the Court to enter the attached Order extending the deadline for the Defendants to file an answer to the *Plaintiff's Motion for Partial Summary Judgement – Fraud* that was filed in this court on December 22, 2021. Currently the answer is due on January 5, 2022. Counsel for the Defendants has long standing family vacation plans for January 3 – 14, 2022. The Defendant requests an extension to January 17, 2022, to file an answer in this matter. The parties agree that Plaintiffs should be afforded a corresponding amount of time within which to file a Reply, if any, including until January 31, 2022.

DATED: December 28, 2021

/s/ Jason M. Tangeman

Jason M. Tangeman, WSB #6-3082  
NICHOLAS & TANGEMAN, LLC  
170 North Fifth Street, P.O. Box 928  
Laramie, WY 82073-0928  
Phone: (307) 742-7140  
Fax: 307-742-7160  
[jtangeman@wyolegal.com](mailto:jtangeman@wyolegal.com)

/s/ Stuart R. Day

Stuart R. Day, WSB #5-2244  
WILLIAMS, PORTER, DAY & NEVILLE, P.C.  
PO Box 10700  
Casper, WY 82602  
(307)265-0700  
(307) 266-2306 (facsimile)  
[sday@wpsdn.net](mailto:sday@wpsdn.net)